

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

RYDIE, *et al.*,

Plaintiffs,

v.

BIDEN, *et al.*,

Defendants.

No. 8:21-cv-2696

Judge Deborah Chasanow

**JOINT MOTION TO STAY DISTRICT COURT PROCEEDINGS PENDING APPEAL**

The parties jointly and respectfully request that the Court stay further proceedings in this case pending Plaintiffs' appeal of the denial of their motion for a preliminary injunction. *See Rydie v. Biden*, No. 21-2359 (4th Cir.). Conducting further proceedings in this Court while overlapping issues are under consideration by the U.S. Court of the Appeals for the Fourth Circuit would result in largely duplicative parallel proceedings and create the risk of inconsistent decisions. Conversely, a stay of proceedings would promote efficiency, conserve judicial and party resources, and permit the parties and the Court to receive the benefit of the Fourth Circuit's reasoning in any further proceedings. Accordingly, this Court should exercise its discretion to temporarily stay district court proceedings during the pendency of the Fourth Circuit appeal. The parties further suggest that they file a proposed schedule for further proceedings within 14 days of the entry of a mandate by the Fourth Circuit. A proposed order is attached to this joint motion.

December 15, 2021

/s/ Jonathan Bolts  
JONATHAN BOLLS (MD Bar #14110)  
P.O. Box 10076

Respectfully submitted,

BRIAN M. BOYNTON  
Acting Assistant Attorney General

5221 Franconia Road  
Alexandria, VA 22310  
Phone: (703) 593-2354  
Email: jonathanbolls@hotmail.com

*Counsel for Plaintiffs*

CHRISTOPHER R. HALL  
CARLOTTA P. WELLS  
Assistant Directors

/s/ Joseph J. DeMott  
STEVEN A. MYERS  
Senior Trial Counsel  
JOSEPH J. DEMOTT (Va. Bar #93981)  
CODY T. KNAPP  
R. CHARLIE MERRITT  
KENZIE K. OVERING  
United States Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street NW  
Washington, DC 20005  
Phone: (202) 514-3367  
Email: joseph.demott@usdoj.gov

*Counsel for Defendants*